

EXHIBIT “E”

Stipulation of January 4, 2021 – Permitting State Court Action against Redmond Solely

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In re: NATIONAL BROKERS OF AMERICA, INC., Debtor.	Chapter 7 Bankruptcy No. 19-15488
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**CONSENT ORDER TO REMAND STATE COURT CLAIMS AGAINST ALAN
CHRISTOPHER REDMOND TO STATE COURT AND TO LIFT STAY FOR STATE
COURT CLAIMS BY JASON SCOTT JORDAN AGAINST ALAN CHRISTOPHER
REDMOND**

Upon the mutual determination and consent of Jason Scott Jordan and the Chapter 7 Trustee, Robert H. Holber (the “Trustee”) that the claims contained within the civil action filed in the Court of Common Pleas, Berks County, Pennsylvania captioned National Brokers of America, Inc. and Alan Christopher Redman v. Jason Scott Jordan and under Docket Number 14-17117 (the “State Court Case”) that were removed to this Court on January 30, 2020 [Doc. No. 70] and captioned under Adversary Proceeding Number 20-00016 (the “Removed State Court Action”) do not constitute a core proceeding as defined in 28 U.S.C. § 152(b)(2) as they do not involve property of the estate pursuant to 11 U.S.C. § 541(a) and thus it does not involve matters concerning the administration of the estate (28 U.S.C. § 157(2)(A)), and Jason Scott Jordan and the Trustee desire for the State Court Case to be remanded back to state court in order for Jordan to immediately prosecute his claims against Alan Christopher Redman only; and it appearing that sufficient notice this Consent Order has been given; and good and sufficient cause appearing for the relief requested herein;

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

1. The Consent Order Resolving Motion of Real Party in Interest Jason Scott Jordan to lift Stay or, alternatively, for Confirmation of Absence of Stay dated January 15, 2020 [Doc. No. 67] (the “Initial Stay Relief Order”) is vacated to the extent inconsistent with this Order.

2. The State Court Action, National Brokers of America, Inc. and Alan Christopher Redman v. Jason Scott Jordan, C.A. No. 14-17117, formerly pending before the Berks County Court of Common Pleas and removed to this court captioned under Adversary Proceeding Number 20-00016 is hereby remanded to the Court of Common Pleas of Berks County Pennsylvania under the authority of 28 U.S.C. § 1447(c) as this Court lacks subject matter jurisdiction over the same.

3. The Removed State Court Action captioned under Adversary Proceeding Number 20-00016 is hereby dismissed consistent with this Order.

4. Trustee hereby relinquishes any right to the claims brought by Jordan in the State Court Action against Alan Christopher Redmond.

5. Notwithstanding the Initial Stay Relief Order, the automatic stay (including a stay under 11 U.S.C. § 362) is hereby lifted as it applies to claims by Jason Scott Jordan against Alan Christopher Redmond in the State Court Action provided however that such State Court Action shall not include any claims against the Debtor or the Trustee nor shall the Trustee be required to participate in any discovery in the State Court Action.

6. The joint litigation/common interest agreement related to the Removed State Court Action between Jordan and the Trustee is hereby concluded and terminated.

7. Any agreement for division of recovery contemplated under the Initial Stay Relief Order is hereby dissolved and terminated.

Dated: January 4 _____, 2021

BY THE COURT:



THE HONORABLE PATRICIA M. MAYER
UNITED STATES BANKRUPTCY JUDGE